

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 1:23-md-03076-KMM**

IN RE:

**FTX CRYPTOCURRENCY EXCHANGE  
COLLAPSE LITIGATION**

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THIS DOCUMENT RELATES TO ALL ACTIONS

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**DEFENDANTS DELTEC BANK AND TRUST COMPANY LIMITED  
AND JEAN CHALOPIN'S RESPONSE IN OPPOSITION TO  
PLAINTIFFS' MOTION TO APPOINT A SPECIAL MASTER**

Defendants Deltec Bank and Trust Company Limited ("Deltec") and Jean Chalopin, by and through their undersigned attorneys, hereby join the Investor Defendants' Opposition to Plaintiffs' Motion to Appoint a Special Master in the above-captioned matter (the "Motion," ECF No. 145) and state as follows:

For the reasons set forth in the Investor Defendants' Opposition to the Motion [ECF No. 180], this Court should deny Plaintiffs' Motion. The Motion is premature at this stage, including because this Court has stayed discovery through at least September 19, 2023 [ECF No. 152], and Plaintiffs have failed to identify any pretrial matters that may require a Special Master's intervention under Federal Rule of Civil Procedure 53(a)(1). Indeed, as to the undersigned defendants, there are none.

The appointment of a Special Master is also premature prior to this Court's consideration of many defendants' forthcoming motions to dismiss. The undersigned defendants, specifically, expect to make a case-dispositive motion to dismiss the claims against them on multiple grounds,

including for failure to state a claim and because Deltec and Mr. Chalopin are Bahamian residents and are not subject to personal jurisdiction in the United States.

Therefore, for all of the foregoing reasons, Plaintiffs' Motion should be denied.

Dated: August 11, 2023

Respectfully submitted,

*/s/ Mallory M. Cooney*

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Mallory M. Cooney  
Florida Bar No. 125659  
mallory.cooney@klgates.com  
Desirée Moore  
desiree.moore@klgates.com  
**K&L Gates LLP**  
200 S. Biscayne Blvd.  
Miami, FL 33131  
Tel: 305-539-3300  
Fax: 305-358-7095

Tatiana Martins  
NY Bar No. 4300455  
tatiana.martins@davispolk.com  
**Davis Polk & Wardwell LLP**  
450 Lexington Avenue  
New York, New York 10017  
Tel: 212-450-4000  
Fax: 212-701-5351

*Attorneys for Defendants Deltec Bank and  
Trust Company Limited and Jean Chalopin*